

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**In Re:**

**Kimberly Renee Coiner**

**Case No. 16-82323-CRJ-13**

**Chapter: 13**

**SSN# XXX-XX-9673**

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**SPECIAL COUNSEL'S MOTION FOR PROTECTIVE ORDER**

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**COMES NOW** the Special Counsel, Trent Lowry and Heath Meherg of the firm of Griffith, Lowry & Meherg, LLC, and files this motion for protective order pursuant to Rule 1.6 (Confidentiality of Information) of the Alabama Rules of Professional Conduct. In support thereof, Special Counsel shows the following:

1. Special Counsel has been requested to disclose certain information that may be in violation of Rule 1.6(a), Ala. R. Prof'l Conduct.

2. Special Counsel seeks to be transparent with this Court, but first needs a protective order to avoid the possibility of violating Rule 1.6, Ala. R. Prof'l Conduct.

3. Rule 1.6(b) allows the disclosure of otherwise protected confidential information in certain circumstances:

(b) A lawyer may reveal such information to the extent the lawyer reasonably believes necessary:

(1) To prevent the client from committing a criminal act that the lawyer believes is likely to result in imminent death or substantial bodily harm; or

(2) To establish a claim or defense on behalf of the lawyer in a controversy between the lawyer and the client, to establish a defense to a criminal charge or civil claim against the lawyer based upon conduct in which the client was involved, or to respond to allegations in any proceeding concerning the lawyer's representation of the client.

Ala. R. Prof'l Conduct R. 1.6(b).

4. Upon consultation with the Alabama State Bar and a review of the Comments to Rule 1.6, Special Counsel requests that a protective order be entered in this case before any further disclosure is requested. *See* Ala. R. Prof'l Conduct R. 1.6 cmt. (" . . . obtain protective orders or make other arrangements minimizing the risk of disclosure.").

**WHEREFORE, PREMISES CONSIDERED,** Special Counsel requests that this Honorable Court enter a protective order prior to the disclosure of any further information by Special Counsel.

**RESPECTFULLY SUBMITTED** this the 29th day of April, 2019.

/s/ Trent Lowry

Trent Lowry  
Heath Meherg  
*Special Counsel*

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed and served a copy of the foregoing in the above-captioned case by using the CM/ECF system.

Jospeh G. Pleva, Attorney for Debtor  
Michele T. Hatcher, Chapter 13 Trustee  
Richard M. Blythe, Assistant U.S. Bankruptcy Administrator

DATED this the 29th day of April, 2019.

/s/ Trent Lowry

Trent Lowry  
Heath Meherg  
*Special Counsel*